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1990-1999

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1919 - 2015

July 13, 2020

**By Fax 585-613-4325 and Hand Delivery**

Hon. Elizabeth A. Wolford  
United States District Court  
for the Western District of New York  
Keating Federal Building  
100 State Street  
Rochester, NY 14614

Re: *Holly Parks, as Administrator of the Estate of her daughter  
Heather Roselli v. Sandra Abdo, et al.*  
Civil Action No.: 20-cv-6384 – EAW

Dear Judge Wolford:

As you may recall, we have been retained by Sandra Abdo, a Defendant in the above-referenced matter for the sole purpose of seeking a defense and indemnification from the State of New York.

On June 15, 2020, we served the State of New York with notice pursuant to New York State Public Officers Law §17 requesting that the State provide Ms. Abdo with a defense and indemnification in this matter. As of this date, the State Attorney General has not made a determination on our demand. If they do not accept Ms. Abdo's defense, it is our intent to initiate a proceeding pursuant to New York State CPLR Article 78 seeking an Order requiring the State to defend Ms. Abdo.

We have discussed this matter with Counsel for the Plaintiff, and they have agreed to allow a further extension of time to answer or otherwise move with respect to the Complaint until July 27, 2020.

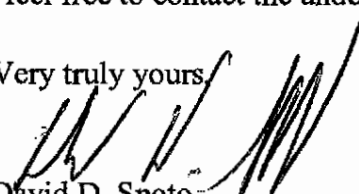
Accordingly, we would ask the Court to so order the extension of time to Answer.

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If you have any questions or concerns, please feel free to contact the undersigned.

Very truly yours,

  
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So Ordered:

  
DATED: 07/13/2020